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11 **UNITED STATES DISTRICT COURT**
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13 **DISTRICT COURT FOR THE DISTRICT OF NEVADA (LAS VEGAS)**
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15 PHILLIP MURRY,
16 Plaintiff,

17 vs.

18 CITY OF NORTH LAS VEGAS
19 POLICE DEPARTMENT; SGT.
20 MICHAEL BOOKER; and DOES 1-
21 10, inclusive,

22 Defendants.

Case No. 2:17-cv-00157-APG-CWH

**STIPULATION AND ORDER TO
EXTEND DEADLINES**

(FIFTH REQUEST)

23 Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of
24 record, hereby stipulate and request that this Court extend discovery in the above-captioned case
25 seven (7) days, up to and including April 9, 2018 for the purpose of allowing Plaintiff to depose
26 Defendant's agent designated under FRCP 30(b)(6). In addition, the parties request that the
27 deadline to file dispositive motions be extended accordingly as outlined herein to permit
28 Defendants to file their motion for summary judgment. In support of this Stipulation and Request,
the parties state as follows:

1. Discovery Completed to Date:

- a) The Parties participated in a conference, as required by Fed. R. Civ. P. 26(f) and LR 26-1(a),

- 1 on April 26, 2017.
- 2 b) All Parties served their respective initial disclosures:
- 3 a. Plaintiff, Phillip Murry (“Murry”) served his initial disclosures on May 10, 2017;
- 4 b. Defendants, City of North Las Vegas Police Department (“NLVPD”) and Sgt.
- 5 Michael Booker (“Booker”) served their initial disclosures on May 30, 2017.
- 6 c) Defendants served their first supplemental disclosures on June 29, 2017.
- 7 d) Plaintiff served Defendant, NLVPD with his first written discovery requests on May 23,
- 8 2017, which included requests for admission and requests for production of documents.
- 9 e) Defendant NLVPD served its responses to Plaintiff’s first written discovery requests
- 10 (following an agreement among the parties to a two-week extension to the deadline for
- 11 Defendant to serve its responses) on July 7, 2017.
- 12 f) Defendant City of North Las Vegas served written discovery requests in June 8, 2017.
- 13 Plaintiff served responses to Defendants’ first requests for production of documents and first
- 14 interrogatories on July 13, 2017.
- 15 g) Plaintiff took the deposition of Sgt. Booker on July 27, 2017.
- 16 h) Defendant took the deposition of Plaintiff on July 28, 2017.
- 17 i) Plaintiff took the deposition of Sgt. Mark Suranowitz on September 27, 2017.
- 18 j) Plaintiff took the deposition of Officer Robert Knickerbocker on September 28, 2017.
- 19 k) Plaintiff took the deposition of Lt. James Brown on October 12, 2017.
- 20 l) Defendant took the deposition of Ira Weiner, M.D. on November 15, 2017.
- 21 m) Plaintiff took the deposition of Hugh Selznick, M.D. on February 1, 2018.
- 22 n) Additional written discovery has been served by Plaintiff to all Defendants and Plaintiff is
- 23 awaiting further responses to the written discovery for which an extension to April 6 was
- 24 agreed on March 30, 2018. A request for *in camera* review was submitted on February 7,
- 25 2018 (Document 25).
- 26 o) Defendant deposed Plaintiff’s expert witness Roger Clark on March 28, 2018.
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1 to and including April 9, 2018 for the purpose of allowing Plaintiff to depose Defendant's agent
2 designated under FRCP 30(b)(6) and the dispositive motion deadline to May 9, 2018 as outlined in
3 accordance with the table above.

4 Dated: <u>3/30/2018</u> LAW OFFICES OF PETER GOLDSTEIN	Dated: <u>4/2/2018</u> LEWIS BRISBOIS BISGAARD & SMITH LLP
5 BY: <u>/s/ Peter Goldstein</u> Peter Goldstein Esq., 6 Bar No. 6992 10795 West Twain Ave., Ste. 110 7 Las Vegas, NV 89135	BY: <u>/s/ Robert W. Freeman</u> Robert W. Freeman, Esq. Nevada Bar No. 7688 6385 S. Rainbow Blvd., Suite 600 Las Vegas, NV 89118 Attorneys for Defendants

9 **ORDER**

10 IT IS SO ORDERED.

11 Dated this __ April 3
12 __, 2018.

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15 U.S. DISTRICT COURT JUDGE
16 U.S. MAGISTRATE JUDGE
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